

Attorneys for Plaintiff  
LORI WADE, Individually and as Personal  
Representative of Paul Alan Wade, Deceased

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

LORI WADE, individually and as Personal Representative of PAUL ALAN WADE Deceased.

No. CV 09 1976 JCS  
E-filing

Plaintiff,

vs.

UNITED STATES OF AMERICA.

Defendant.

**(PROPOSED) ORDER COMPELLING  
PRODUCTION OF DOCUMENTS  
RESPONSIVE TO PLAINTIFF'S  
SECOND REQUEST FOR  
PRODUCTION**

Pursuant to Request No. 19 of Plaintiff's Second Request for Production of Documents, Plaintiff sought production of letters of qualification or recertification qualifying the following individuals to stand watch at the San Francisco Command Center on July 13, 2007: Cdr. Jonathan Copley, Lt. Aja Kirksey, BM1 Christopher O'Donnell, OS3 Jessica LaRue, and Joseph Ford. Pursuant to Request No. 20 of Plaintiff's Second Request for Production of Documents, Plaintiff sought production of letters of qualification or recertification qualifying the following individuals to stand watch at the Vessel Traffic Service San Francisco: Mark Perez, Leonard

Newsom, Richard Lopez, and Greg Corning.

Plaintiff contends that said records are relevant to the subject matter of the within action and are not privileged.

Defendant objects on grounds that said records may contain information which is protected from release under the Privacy Act, 5 USC § 552a. Defendant does not otherwise object to production but will not produce said records without an appropriate Court Order.

Good cause appearing, it is hereby ORDERED:

That the documents requested by Requests Nos. 19 and 20 of Plaintiff's Second Request for Production of Documents be produced by Defendant United States for the aforesaid individuals, without redaction except for 1.) Social Security numbers, 2.) names of certain other individuals who served on the boards, 3.) some grade/GS levels; and

That said production be accomplished within ten days, not counting weekends or holidays, of the date of entry of this Order.

**IT IS SO ORDERED.**

Dated: 12/07/10

HON. JUDGE JOSEPH C. SPERO  
UNITED STATES DISTRICT COURT OF THE DISTRICT OF CALIFORNIA  
UNITED STATES MAGISTRATE JUDGE

Presented by:

Dated: 12.6.10

Derek Jacobson  
Attorney for Plaintiff

Approved as to form only, without waiving the aforesaid objections, and without approval as to substance:

Dated: 12/4/10

Jeanne M. Franken  
Trial Attorney for Defendant  
United States of America